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June 6, 2006

VIA FEDERAL EXPRESS

Clerk
United States District Court
District of Delaware
844 King Street, Lock Box 18
Wilmington, Delaware 19801
Attn.: Dot Blansfield

**Re: Hanover Insurance Company v. Canal Insurance Company
US District Court, District of Delaware - Miscellaneous Case No.: 05-230
US District Court, District of New Jersey Civil Docket No.: 05-1591(JWB)
Our File No. : 450.17737/FXG**

Dear Ms. Blansfield:

On June 7, 2006, we sent to your office an original and two copies each of a Notice to Take Oral Depositions of Cheryl Hurlock for June 23, 2006, and a Notice to Take Oral Depositions of Jeffrey Good, Marty Twardus, Sherman Dunn and Lebertha Dunn for June 29, 2006. We also forwarded to you a disk with all of those documents on them, together with a Federal Express envelope, requesting that the originals be filed and the copies be sent to the Wilmington Delaware firm of Swartz Campbell, 300 Delaware Avenue, Suite 1130, Wilmington, Delaware.

On June 8, 2006, I received a telephone call from a member of your staff asking several questions about these pleadings. I had mentioned that we have filed identical pleadings previously and had not had any problem with them, and I was advised that, since they had gone through before, you would forward the copies to Swartz Campbell in the Federal Express envelope which we had previously provided with our June 7, 2006 letter as soon as you received a separate disk for each pleading. I should add that we had sent one disk previously on at least two occasions, encompassing all of the subpoenas and deposition notices and had never been advised that there was a problem with them. I did not get the name of the person to whom I spoke, but, it was a man, and he said that he would advise you in this regard.

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In order to comply with the request as to having a separate disk for each pleading, I am enclosing herewith seven separate disks. One is the Notice to Take Oral Depositions of Ms. Hurlock for June 23, 2006, one is the Notice to Take Depositions of Mr. Good, Ms. Twardus, Mr. Dunn and Mrs. Dunn for June 29, 2006 and the other five are the subpoenas, respectively, of each of those people.

We presently have a discovery end date of July 15, 2006. We have had some difficulty in obtaining the depositions of these people for various reasons, and it is extremely important that these subpoenas be sent to Nicholas Skiles at the Swartz Campbell by Federal Express so that he will receive them on June 12, 2006 and be in a position to have the subpoenas served promptly.

It is urgent that these subpoenas be served as quickly as possible so that we may conduct the depositions. I do not know whether the Court will permit a further extension of discovery, and, therefore, I am requesting that you kindly give this matter your prompt attention.

Thank you very much for your anticipated courtesies in this regard.

Very truly yours,

FRANK R. CINUINA

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Enclosures

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